

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

MORGAN HANSEN,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:15-CV-6058-BP
	)	
MISSOURI STATE HIGHWAY PATROL,	)	
et al.,	)	
	)	
Defendants.	)	

**JOINT REPORT OF THE PARTIES AND PROPOSED SCHEDULING ORDER**

Pursuant to Fed.R.Civ.P. 26(f), this Honorable Court's September 24, 2015 Order and Local Rule, an initial meeting of the parties was held on September 28, 2015, with attorneys for Plaintiff and Defendant participating.

SCHEDULING AND DISCOVERY PLANS HAVE BEEN DISCUSSED AND AGREED TO AS FOLLOWS:

1. Joinder of additional parties and amendment of the pleadings shall be made by November 30, 2015.
2. Initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1) shall be made by November 13, 2015.
3. At this time, there is no need to conduct discovery in phases or limit it to certain issues.
4. Expert witnesses shall be disclosed, along with a written report prepared and signed by the witness pursuant to Fed.R.Civ.P. 26(a)(2) as follows:  

Plaintiff's expert(s): March 4, 2016;

Defendants' expert(s): April 13, 2016.

5. Depositions of expert witnesses must be taken by:

Plaintiff's expert(s): April 1, 2016;

Defendants' expert(s): May 11, 2016.

6. The presumptive limits of ten (10) depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A), and twenty-five (25) interrogatories per party as set forth in Fed.R.Civ.P. 33(a) should apply in this case.

7. The parties do not anticipate requesting a protective order as it would relate to discovery in this matter.

8. Physical or mental examinations of the parties pursuant to Fed.R.Civ.P. 35 will not be requested.

9. Discovery shall be completed by May 27, 2016.

10. All dispositive motions, except those under Rule 12(h)(2) or (3), or, if applicable, any motion to exclude testimony pursuant to Daubert v. Merrell Dow Pharmaceuticals, Inc., 509 U.S. 579 (1993) or Kuhmo Tire Co. Ltd v. Carmichael, 526 U.S. 137 (1999), shall be filed no later than May 20, 2016.

11. The earliest date this case will be ready for trial is November 28, 2016.

12. This case will be tried to a jury and the parties expect the trial to last three (3) days based upon the number of witnesses expected to be called and issues involved.

DATED: October 13, 2015

BY: /s/ James W. Schottel, Jr.  
James W. Schottel, Jr. #51285  
SCHOTTEL & ASSOCIATES, P.C.  
906 Olive St., PH  
St. Louis, MO 63101  
(314) 421-0350  
(314) 421-4060 facsimile  
jwsj@schotteljustice.com

Attorney for Plaintiff  
Morgan Hansen

BY: /s/ Lynn M. Stoppy  
Lynn M. Stoppy #47351  
Assistant Attorney General  
CHRIS KOSTER, Attorney General  
615 E. 13th Street, Suite 401  
Kansas City, MO 64106  
(816) 889-5014  
lynn.stoppy@ago.mo.gov

Attorney for Defendant  
Thomas J. Black

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Lynn M. Stoppy  
lynn.stoppy@ago.mo.gov

Attorney for Defendant  
Thomas J. Black

s/James W. Schottel, Jr.